

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

COALITION FOR TJ,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 1:21-cv-00296-CMH-JFA
)	
FAIRFAX COUNTY SCHOOL BOARD,)	
)	
Defendant.)	

DEFENDANT FAIRFAX COUNTY SCHOOL BOARD'S PROPOSED WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's Scheduling Orders, Defendant Fairfax County School Board provides the following about the witnesses that it may present at trial other than solely for impeachment:

A. Witnesses Whom the School Board Expects to Call

1. Jeremy Shughart
2. Scott S. Brabrand

B. Witnesses Whom the School Board May Call if the Need Arises

3. Beverly Madeja
4. Ricardy Anderson
5. Laura Jane Cohen
6. Karen Corbett Sanders
7. Tamara Dernak-Kaufax
8. Karl Frisch
9. Karen Keys-Gamarra
10. Megan McLaughlin

11. Melanie Meren
12. Abrar Omeish
13. Stella Pekarsky
14. Rachna Sizemore-Heiser
15. Elaine Tholen
16. Any witness identified in Plaintiff's Rule 26(a)(3)(A) disclosures to whom Defendant does not object or to whom Defendant's objection is overruled.

C. Designation of Those Witnesses Whose Testimony the School Board Expects to Present by Deposition

The School Board expects to present by deposition the testimony of Coalition for TJ as given by its Rule 30(b)(6) designees Asra Nomani and Glen Miller. The portions of those depositions that the School Board expects to offer are designated on Exhibit A. All page and line designations refer to pages and lines in the original official transcripts (i.e., non-rough transcripts, prior to any errata). To the extent that any designations are modified by subsequent errata, the School Board reserves the right to amend these designations based on such errata. The School Board also reserves the right not to offer any of the above designated testimony, or to offer only portions of the designated testimony. It further reserves the right, to the fullest extent permitted by the Court's pretrial Orders, Local Rules, and the Federal Rules of Civil Procedure and Evidence, to designate different or additional testimony in response to Plaintiff's counter-designations, or in connection with the parties' meet-and-confers relating to any party's objections to any designated testimony.

The School Board further reserves the right to present any other witnesses through deposition should such witnesses become unavailable to testify in person at trial.

Respectfully submitted,

FAIRFAX COUNTY SCHOOL BOARD

By: /s/

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Counsel for Defendant Fairfax County School Board

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record for all Parties.

 /s/
Sona Rewari (VSB No. 47327)

Exhibit A
Defendant's Deposition Designations

ASRA NOMANI

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GLENN MILLER

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